

**REMARKS**

Considering first the rejection of claims 1-4 under 35 USC §102(e) as anticipated by Pu, and the rejection of claims 7 to 9, 16 and 17 as obvious from Pu, Pu teaches in Figs. 6 and 10 an adhesive dam (303) surrounding a semiconductor chip (31) and an encapsulant (35) covering the semiconductor chip and the adhesive dam. The Examiner takes the position that Pu's adhesive dam (303) and the encapsulant (35) are equivalent to the stiffener and the second resin as defined in Applicant's claim 1. Even assuming arguendo the Examiner's characterization of Pu, there are other and more basic differences. Specifically, there is no teaching or suggestion anywhere in Pu that his underfilling adhesive (33) corresponds to the first resin of the present invention and is different in a thermal expansion coefficient from his second resin (35). All that Pu teaches is that an adhesive compound having a larger coefficient of thermal expansion than that of a substrate is used to form an adhesive dam around a semiconductor chip on the substrate.

Since this basic and essential feature of Applicant's claimed invention as defined by independent claims 1 and 7 is not found anywhere within the four corners of Pu, and the advantages thereof are not recognized by Pu, it is submitted that the rejection of claim 1, and the several claims 2-4, 9, 16 and 17 which depend directly or indirectly on claim 1 cannot be said to be anticipated by or obvious from Pu.

Independent claim 7 like independent claim 1 also requires first and second resins in which the first resin filling a gap between the semiconductor chip and mounting substrate has a different thermal expansion coefficient from the second resin. Nor does Pu recognize the advantages of using two resins of different thermal expansion coefficient as required by

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Applicant's claim 7. Thus, claim 7 and claim 8, which depends thereon, cannot be said to be obvious from Pu.

Turning to the rejection of claims 1-4, 7-9, 16 and 17 under 35 USC §103(a) as being unpatentable over Akram, et al ("Akram"), Akram also fails to disclose a first resin being different in a thermal expansion coefficient from a second resin. Akram teaches in its Figs. 4 and 5 a barrier glob top (424) surrounding a semiconductor chip (402) and covering an underfill encapsulant (422). The Examiner alleges that both a stiffener and a second resin are regarded as the "barrier glob top" disclosed in Akram. Even assuming arguendo the Examiner's characterization of Akram, there is no teaching or suggestion anywhere in Akram that an underfill encapsulant (422) corresponding to the first resin of the present invention is different in a thermal expansion coefficient from the second resin (424). Akram only teaches in column 4, lines 2-5 that the barrier glob top material is selected for low moisture permeability, low thermal coefficient of expansion, good adhesion and sealing properties. Thus, Akram also fails to disclose or suggest all elements of the invention as claimed in claim 1 and claim 7 and the several claims 2-4, 8, 9, 16, and 17, which depend, directly or indirectly therefrom, as the case may be.

Considering next the rejection of claims 1 to 6 as anticipated by Gealer, and the rejection of claims 7 to 9, 16 and 17, as obvious from Gealer, the Gealer published U.S. application was filed after the claimed priority date of the subject application of February 3, 2003 of Applicant's underlying Japanese Application No. 026485/2003. A certified copy of Applicants' underlying Japanese application has already been filed in this case. A Verified English Translation of Applicants' underlying Japanese application accompanies this

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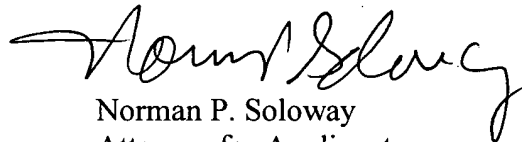
Amendment. With the filing of the Verified English Translation, Applicants' priority claim is perfected, and the Gealer U.S. Published Application is removed as citable prior art.

Finally, and with reference to the Howard, Larson and Fridolph decisions referred to by the Examiner, it is submitted that none of these decisions is applicable. A one-piece structure would have the same thermal expansion coefficient throughout. Applicant's claimed invention is concerned, on the other hand, with reducing stress and destruction caused by a difference in thermal expansion coefficient of a multi-piece structure.

Having dealt with all the objections raised by the Examiner, the Application is believed to be in order for allowance. Early and favorable action is respectfully requested.

In the event there are any fee deficiencies or additional fees are payable, please charge them (or credit any overpayment) to our Deposit Account Number 08-1391.

Respectfully submitted,



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**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: MAIL STOP AMENDMENT, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on September 18, 2006, at Tucson, Arizona.

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